83770

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-11

JUN 05 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
MUNCIE, IN 47302

Re: Wayne Reclamation and Recycling ("Site")
Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCLA).

In accordance with the requirements of Section 104(b) of CERCLA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCLA, undertake the remedial action itself and, under Section 107 of CERCLA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCLA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCLA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCLA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCLA and other laws. In accordance with Section 107(a) of CERCLA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and

- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCLA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCLA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;

- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- a demonstration of the PRPs' capability to finance the RD/RA;
- a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary circumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990
10:30 a.m.
Fort Wayne, Indiana
Holiday Inn, Grand Ballroom
300 E. Washington Blvd.
(219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCLA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,

John Kelley, Acting Chief
Remedial and Enforcement Response Branch

Enclosures

cc: Sheila Huff, DOI
Doug Fisher, IDEM
Tom Mariani, DOJ
Patrick Ralsdon, IDNR
Environmental Defense Section, DOJ
Indiana Attorney General
Dan Sparks, USFW

ATTACHMENT I

A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record - Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.

B. The current PRP Group has conducted the following studies and/or activities at the Site.

1. 1986 Removal Action - removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.

2. Remedial Investigation - to determine the nature and extent of contamination at the Site.

3. 1988 Removal Action - conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.

4. Feasibility Study - to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.

5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.

6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.

C. Past Costs: As of October 17, 1989, $622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid $56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are $565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

ATTACHMENT II

The names and addresses of all parties receiving a copy of this letter are attached.

CURRENT WRR PRP GROUP STEERING COMMITTEE

William N. Hall
Breed, Abbott & Morgan
1875 Eye Street, N.W.
Washington, D.C. 20006
(202)466-1118

Christopher J. Dunsky
Honigman Miller Schwartz and Cohn
2290 First National Building
Detroit, Michigan 48226
(313) 256-7872

**** TSO FOREGROUND HARDCOPY ****
DSNAME=CPISSAI.FOCUS.OFFLINE

Wayne Waste Oil Site
List of PRPs
to be sent
Special Notice letters in Feb 1990

Received from ADP on 1/16/90

LINE UP THESE LABELS PLEASE! THEY'RE FOR B116
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL

900116
A OF I
C/O MELVIN A. ATKIN
P.O. BOX 70
HAMILTON,IN_46742

1 900116
ADMETCO, INC. SCRAP METALS
7625 VICKSBURG PIKE
FORT WAYNE,IN_46804

3 900116
BLUFFTON LIGHT AND WATER
128 EAST MARKET
BLUFFTON,IN_46714

4 900116
BROOKS CONSTRUCTION
P.O. BOX 9560
FORT WAYNE,IN_46899

2 900116
ANGOLA DIE CASE
410 WEATHERHEAD STREET
ANGOLA,IN_46703

6 900116
E.R. CARPENTER
195 COUNTY ROAD 15 SOUTH
P.O. BOX 2386
ELKHART,IN_46515

7 900116
CELOTEX CORP.
P.O. BOX 157
LAGRO,IN_46941

5 900116
L.H. CARBIDE
4420 CLOVIEW DRIVE
FORT WAYNE,IN_46804

9 900116
ERIE STONE
500 ERIE STONE ROAD
HUNTINGTON,IN_46750

10 900116
ESIDE CORP.
303 WATER STREET
LOGANSPORT,IN_46947

8 900116
CENTRAL STEEL & WIRE CO.
C/O PRENTICE-HALL CORP. SYSTEM
CIRCLE TOWER BUILDING
INDIANAPOLIS,IN_46204

12 900116
WILLIAM J. FRANKE, PRESIDENT
FRANKE PLATING WORKS, INC.
2109 E. WASHINGTON BOULEVARD
FORT WAYNE,IN_46714

13 900116
FRICTION MATERIALS
1809 SABINE
HUNTINGTON,IN_46750

11 900116
FIDLER'S
P.O. BOX 99
GOSHEN,IN_46526

15 900116
GRISSOM AFB (PERU)
BASE CIVIL ENGINEER
GRISSOM AFB,IN_46971

16 900116
HINCO WASTE-AWAY SERVICE, INC.
707 N. WILDWOOD AVENUE
ELKHART,IN_46750

14 900116
GOSHEN IRON & METAL
409 WEST LINCOLN AVENUE
GOSHEN,IN_46526

18 900116
HOWARD MARTIN HEAVY HAULERS
4315 MEYER ROAD
FORT WAYNE,IN_46806

19 900116
HY-MATIC MFG., INC.
W. OHIO STREET
KENDALLVILLE,IN_46755

17 900116
HOOK INDUSTRIAL SALES
2731 BROOKLYN AVENUE
FORT WAYNE,IN_46803

21 900116
JESSEN MFG.

22 900116
S.P. JOHNSON

20 900116
INCO ALLOYS

Wayne Waste Oil Site
List of PRPs to be sent
special notice letters in
Feb 1990

Jessen Mfg.
P.O. BOX 1727
ELKHART,IN_46516

SE Johnson
201 S. THOMAS ROAD
FORT WAYNE,IN_46808

Inco Alloys
5280 HIGGINS BOULEVARD
ELKHART,IN_46507

24 900116
KEY MACHINE TOOL, INC.
53928 COUNTY ROAD, 5N
P.O. BOX 1004
ELKHART,IN_46515-1004

25 900116
KRIZMAN
1141 E. 12TH STREET
MISHAWAKA,IN_46544

23 900116
KENDALLVILLE ~~FROM S HEIL~~ Castings
~~P.O. BOX 69~~ P.O. Box 337
KENDALLVILLE,IN_46755

27 900116
MARTINS INC.
P.O. BOX 522
FORT WAYNE,IN_46815

28 900116
MCGILL MFG.
705 N. 6TH STREET
MONTICELLO,IN_47960

26 900116
MACALLISTER MACHINERY
P.O. BOX 8944
FORT WAYNE,IN_46808

30 900116
MOTE CONSTRUCTION
P.O. BOX 229
UNION CITY,IN_47390

31 900116
NORTHERN INDIANA MANUFACTURING
105 S. THAYER
BOURBON,IN_46504

29 900116
MINNICH MFG.
2421 N. WALLEN ROAD
FORT WAYNE,IN_46818

33 900116
NIPSCO
114 E. WAYNE STREET
FORT WAYNE,IN_46802

34 900116
NIPSCO
232 SO. MAIN STREET
GOSHEN,IN_46526

32 900116
NIPSCO
820 BROADWAY
CHESTERTON,IN_46304

36 900116
NORRIS TRUCKING
P.O. BOX 31
U.S. 20 WEST
LAGRANGE,IN_46761

37 900116
NUCOR FASTENERS
P.O. BOX 6100
ST. JOE,IN_46785

35 900116
NIPSCO
101 S. MICHIGAN STREET
PLYMOUTH,IN_46563

39 900116
OTMY, INC.
486 N. COUNTY ROAD
300 NORTH
WARSAW,IN_46580

40 900116
PRECISION PIECE PARTS
712 SOUTH LAGON
MISHAWAKA,IN_46544

38 900116
O'BRIEN CORP.
P.O. BOX 17
SOUTH BEND,IN_46628

42 900116
REITH REILLY
P.O. BOX 1108
ELKHART,IN_46515

43 900116
REITH RILEY CONSTRUCTION
P.O. BOX 477
GOSHEN,IN_46526

41 900116
RGJ MANUFACTURING
1420 STANLEY DRIVE
PLYMOUTH,IN_46563

45 900116
SIBERLING MFG.
2010 GUY BROWN DRIVE
DECATUR,IN_46733

46 900116
STRAUSS, INC.
P.O. BOX 149
NORTH MANCHESTER,IN_46962

44 900116
SHELLER GLOBE
16836 STATE RD 37
GRABILL,IN_46741

48 900116
TOOL CRAFT
2620 ADAMS CENTER ROAD
FORT WAYNE,IN_46803

49 900116
TRUMBALL & SONS
P.O. BOX 87
LARWILL,IN_46764

47 900116
T&M RUBBER
1102 S. 10TH STREET
P.O. BOX 516
GOSHEN,IN_46526

51 900116
UNIROYAL
P.O. BOX 958
STATE ROAD 15 NORTH
WARSAW,IN_46580

52 900116
UNITED TOOL
P.O. BOX 1352
ELKHART,IN_46575

50 900116
U.S. GRANULES
P.O. BOX 130
1433 WESTERN AVENUE
PLYMOUTH,IN_46563

54 900116
WARNER & SONS CONTRUCTIONS
29099 U.S. HIGHWAY 33 N
ELKHART,IN_46516

55 900116
NEIL-MCLAIN
DIVISION OF MARLEY CO.
BLAINE STREET
MICHIGAN CITY,IN_46360

53 900116
WALKER MFG.
P.O. BOX 352
LIGONIER,IN_46767

57 900116
A. WATTERSLEY & SON
P.O. BOX 5366
3939 MOBILE AVENUE
FORT WAYNE,IN_46895

58 900116
ACTIVE PRODUCTS CORP.
HERBERT A. SPITZER, JR.
ATTORNEY AT LAW
P.O. BOX 927
MARION,IN_46852

56 900116
YODER OIL
P.O. BOX 10
ELKHART,IN_46515

60 900116
ALECTRICO, INC.
55800 CURRANT ROAD
P.O. BOX 690
MISHAWAKA,IN_46544

61 900116
GARY CROUTH
ALUMINUM COMPANY OF AMERICA
1501 ALCOA BUILDING
PITTSBURGH,PA_15219

59 900116
ALBION WIRE
P.O. BOX 156
STATE ROAD 8 EAST
ALBION,IN_46701

63 900116
AMOCO OIL COMPANY
200 E. RANDOLPH DRIVE
CHICAGO,IL_60601

64 900116
ANACONDA POWER CABLE COMPANY
EAST EIGHTH
MARION,IN_46952

62 900116
MR. REECE PRATHER
ANCAST INDUSTRIAL CORPORATION
P.O. BOX 98
DAYTON,OH_45401

66 900116
MARTHA RUSSELLS MOYER
SR. ATTORNEY, ANR PIPELINE CO.
500 RENAISSANCE CENTER
C/O ONE WOODARD AVE.
DETROIT,MI_48263

67 900116
APOLLO DISPOSAL
P.O. BOX 410
ANGOLA,IN_46703

65 900116
ANGLIN COMPANIES, INC.
1402 W. MAIN
FORT WAYNE,IN_46808

69 900116
ASHLEY WARD, INC.
56883 ELKHART COURT
ELKHART,IN_46516

70 900116
AUSTIN PETROLEUM
99 E. JOE STREET
HUNTINGTON,IN_46750

68 900116
ARLO SMITH
RURAL ROUTE 5
COLUMBIA CITY,IN_46725

72 900116
BASTIAN PLATING CO., INC.
625 W. 15TH STREET
AUBURN,IN_46706-2133

73 900116
JOHN BARCOT
130 E. SUTTENFIELD
FORT WAYNE,IN_46803

71 900116
BPC MFG.
DIVISION OF BRISTOL CORP.
1755 N. OAK ROAD
PLYMOUTH,IN_46563-0991

75 900116
BLUFFTON POWER PLANT
514 E. WASHINGTON
BLUFFTON,IN_46714

76 900116
BOCK PRODUCTS
1901 W. WIZELY
ELKHART,IN_46517

74 900116
CHARLES W. CHAFFEE, PRESIDENT
BLUFFTON RUBBER CO., INC.
P.O. BOX 255
BLUFFTON,IN_46714

78 900116
BREMAN CASTING
500 N BALTIMORE
BREMAN,IN_46506

79 900116
CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
MUNCIE,IN_47302

77 900116
LINDA J. SZEMBRUCH
BORG-WARNER CORPORATION
200 SOUTH MICHIGAN AVENUE
CHICAGO,IL_60604

81 900116
DARYL LAMBERT
C AND R BARREL PLATING CORP.
COLUMBIA CITY,IN_46725

82 900116
CARTER LUMBER COMPANY
5625 PENDELTON
ANDERSON,IN_46011

80 900116
BUNGE CORP. OF INDIANA
HIGHWAY 25
P.O. BOX 180
LOGANSPORT,IN_46947-0188

84 900116
CHEMICAL LEHMAN TANKLINES
5606 SOUTH U.S. HIGHWAY 421
WESTVILLE,IN_46391

85 900116
CHEMSOLV, INC.
604 S. SCOTT
P.O. BOX 1433
SOUTH BEND,IN_46624-1433

83 900116
CENTRE PROPERTIES, LTD.
19 S. LASALLE
CHICAGO,IL_60603

87 900116
CITY ENGINEER'S OFFICE
WATER POLLUTION CONTROL
CITY HALL
FORT WAYNE,IN_46803

88 900116
CNI WABASH CAST, INC.
P.O. BOX 668
WABASH,IN_46992

86 900116
TIMOTHY J. BLOOM
CITY OF COLUMBIA CITY, CITY HALL
CHAUNCEY STREET
COLUMBIA CITY,IN_46725

90 900116
DONALD S. WOELFEL
COLWELL/GENERAL, INC.
P.O. BOX 329
FORT WAYNE,IN_46801

91 900116
COLWELL/GENERAL, INC.
J. MICHAEL O'HARA, ESQ.
P.O. BOX 2263
BARRETT, BARRETT & MCNAGNY
FORT WAYNE,IN_46801

89 900116
COACHMAN INDUSTRIES
601 E. BEARDSLEY
ELKHART,IN_46515

93 900116
RICHARD D. TEEPLE
COOPER TIRE AND RUBBER COMPANY
FINDLAY,OH_45840

94 900116
RICHARD D. TEEPLE
COOPER TIRE AND RUBBER COMPANY
FINDLAY,OH_45840

92 900116
CONCORDIA THEOLOGICAL SEMINARY
6600 N. CLINTON
FORT WAYNE,IN_46825

96 900116
COVER-ALL RENTAL SERVICE
3201 BROOKLYN AVENUE
FORT WAYNE,IN_46809

97 900116
CRANE EDMUND
550 NORTH BROADWAY
BUTLER,IN_46721

95 900116
RAYMOND C. MARSH
DIVISION COUNSEL
CORNING GLASS WORKS
LEGAL DEPARTMENT
CORNING,NY_14831

99 900116
CUSTARD INSURANCE ADJUSTERS, INC.
P.O. BOX 10479

100 900116
JOHN CANAN
VICE PRESIDENT, ENGINEERING

98 900116
ELIZABETH BOTTORFF AHLEMANN
CTS CORPORATION

FORT WAYNE,IN_46852

102 900116
DAYCO CORPORATION
1200 W. MICHIGAN AVENUE
THREE RIVERS,MI_49093

105 900116
DEKALB MOLDED PLASTICS
U.S. HIGHWAY 6 WEST
BUTLER,IN_46721

108 900116
DIESTER MACHINE
1933 E. WAYNE STREET
FORT WAYNE,IN_46803

111 900116
DOUGLASS CONSTRUCTION CO., INC.
4777 REED ROAD
FORT WAYNE,IN_46815

114 900116
E-REC-TO
P.O. BOX 846
MISHAWAKA,IN_46544

117 900116
EDGERTON METAL PRODUCTS, INC.
218 E. BENENT
EDGERTON,OH_43517

120 900116
MILES C. GERBERING
BARRETT, BARRETT & MCNAGNY
P.O. BOX 2263
ELECTRIC MOTORS & SPECIALTIES INC
FORT WAYNE,IN_46801

123 900116
ELMHURST BUS GARAGE
FORT WAYNE SCHOOL DISTRICT
6006 ARDMORE AVENUE
FORT WAYNE,IN_46809

126 900116

P.O. BOX 1388
DALTON FOUNDRIES, INC.
WARSAW,IN_46580

103 900116
LARRY L. TUCKER
DAYTON-WALTHER CORPORATION
600 EAST HIGHLAND AVENUE
MUNCIE DIVISION
MUNCIE,IN_47303

106 900116
STEVEN L. ARTUSI, ESQ.
CORPORATE COUNSEL DE PUY
P.O. BOX 988
WARSAW,IN_46580

109 900116
DOTCO COPPER AIR TOOLS
4030 STATE ROUTE 18
BICKSVILLE,OH_43526

112 900116
DWYER INSTRUMENT
55 HARD
WARARUSA,IN_46360

115 900116
ROBERT E. BRYDEN
ASSOCIATE COUNSEL, E-SYSTEMS INC.
P.O. BOX 660248
DALLAS,TX_75266

118 900116
EDON MACHINE DIVISION
SIMPSON INDUSTRIES, INC.
W. INDIANA
EDON,OH_43518

121 900116
ELKHART PRODUCTS CORP.
700 RAINBOW ROAD
GENEVA,IN_46740

124 900116
EPCO PRODUCTS
P.O. BOX 387
NEW HAVEN,IN_46774

127 900116

905 NORTH WEST BOULEVARD
ELKHART,IN_46514

101 900116
CLEMENT A. REVETTI
LEGAL COUNSEL
P.O. BOX 1000
DANA CORPORATION
TOLEDO,OH_43697

104 900116
DEKALB CENTRAL SCHOOL DISTRICT
P.O. BOX 503
AUBURN,IN_46706

107 900116
WM. A. DIDIER & SONS
613 HIGH STREET
P.O. BOX 10748
FORT WAYNE,IN_46853-0748

110 900116
MR. NORBERT P. STROBEL
MANUFACTURING ENGINEERING MANAGER
141 RAILROAD STREET
DOUGLAS COMPONENTS CORPORATION
BRONSON,MI_49028

113 900116
DYNAMIC POWER CORPORATION
RURAL ROUTE 2
P.O. BOX 148
OSSIAN,IN_46777

116 900116
KATHRYN L. GOETZ, ATTORNEY
EAGLE-PICHER INDUSTRIES, INC.
P.O. BOX 779
CINCINNATTI,OH_45201

119 900116
ELCO INDUSTRIES, INC.
P.O. BOX 606
LOGANSPORT,IN_46947

122 900116
CITY OF ELKHART
CITY MUNICIPAL BUILDING
229 S. 2ND.
ELKHART,IN_46516

125 900116

EXACTO, INC. OF SOUTH BEND
1137 S. LAFAYETTE
P.O. BOX 597
SOUTH BEND,IN_46624

129 900116
FLEX STEEL INDUSTRIES, INC.
P.O. BOX 129
NEW PARIS,IN_46553

132 900116
ROY S. NOWAKOWSKI
FRANKLIN ELECTRIC COMPANY, INC.
400 EAST SPRING STREET
BLUFFTON,IN_46714

135 900116
G.C.G. ENTERPRISES
2204 LIBERTY DRIVE
MISHAWAKA,IN_46544

138 900116
THOMAS M. ARMSTRONG
COUNSEL-ENVIRONMENTAL ISSUES
GENERAL ELECTRIC COMPANY
FAIRFIELD,CT_06431

141 900116
DAVID C. LEE
STATE GENERAL COUNSEL & SEC.
P.O. BOX 407
GENERAL TELEPHONE COMPANY
WESTFIELD,IN_46704

144 900116
JOHN ROSS
VICE PRESIDENT - E.P.A.
111 EAST BROAD STREET
GRIPCO FASTENERS DIVISION OF NITE
SOUTH WHITELY,IN_46787

147 900116
HENDRICKSON TANDEM CORP.
BOLER INVESTMENTS, INC.
P.O. BOX 927
KENDALLVILLE,IN_46755

150 900116
HOOK IND. SALES
2731 BROOKLIN AVENUE
FORT WAYNE,IN_46804

LAUREN H. HORISZNY
CORPORATE COUNSEL
2855 COOLIDGE
EX-CELL-O CORP.
TROY,MI_48084

130 900116
FORT WAYNE AIR SERVICE
(RA) JOHN DILLEY
4021 AIR ST. BAKERFIELD
FORT WAYNE,IN_46809

133 900116
FREEMONT MFG.
DIVISION OF SIMPSON IND. INC.
S. TILLOTSON
FREMONT,IN_46737

136 900116
GASOLINE EQUIPMENT SRV. CO., INC.
P.O. BOX 10478
FORT WAYNE,IN_46852

139 900116
D. W. MONRMAN
MANAGER-ENVIRONMENTAL PROGRAMS
P.O. BOX 2230
GENERAL ELECTRIC COMPANY
FORT WAYNE,IN_46801

142 900116
GENEVA SCREW MACHINE PRODUCTS INC
U.S. 27 N.
P.O. BOX 241
ROUTE 1
GENEVA,IN_46740

145 900116
HAGERMAN CONSTRUCTION CORP.
501 W. WASHINGTON BOULEVARD
FORT WAYNE,IN_46802

148 900116
HILLSDALE TOOL & MFG. CO.
135 E. SOUTH
HILLSDALE,MI_49242

151 900116
HOOVER DRAINAGE
GRINN ROAD
HUNTINGTON,IN_46750

ESSEX INTERNATIONAL, INC.
UNITED TECHNOLOGY CORPORATION
UNITED TECHNOLOGY BUILDING
HARTFORD,CT_06101

128 900116
FLAFLON, INC.
1610 CIRCLE
SOUTH BEND,IN_46628

131 900116
FORT WAYNE WATER
POLLUTION CONTROL PLANT
2601 DWENGER AVENUE
FORT WAYNE,IN_46803

134 900116
G-G SERVICE CO.
GLENBROOK SQUARE SHOPPING CENTER
FORT WAYNE,IN_

137 900116
GATES CHEVROLET CORP.
401 S. LAFAYETTE
SOUTH BEND,IN_46601

140 900116
GENERAL PETROLEUM, INC.
3919 MOBILE
FORT WAYNE,IN_46805

143 900116
GENOVA, INC.
7034 E. COURT
DAVISON,MI_48423

146 900116
TOM HARGETT
FRUEHAUF CORP.
LIQUID AND BULK TANK DIVISION
P.O. BOX 660
FORT WAYNE,IN_46801

149 900116
HOLMES AND COMPANY
807 EAST ELLSWORTH
P.O. BOX 370
COLUMBIA CITY,IN_46725

153 900116
ITT AEROSPACE/OPTICAL DIVISION
DIVISION OF ITT CORP.
P.O. BOX 3700
FORT WAYNE,IN_46801-3701

154 900116
INCO, INC.
P.O. BOX 444
HUNTINGTON,IN_46750

152 900116
THOMAS L. ALDRICH
ASSISTANT GENERAL COUNSEL
2700 SANDERS ROAD
HOUSEHOLD MANUFACTURING, INC.
PROSPECT HEIGHTS,IL_60070

156 900116
INDIANA DIE MOLDING
DIVISION OF HARNEY INDUSTRIES INC
9100 FRONT STREET
FORT WAYNE,IN_46818-2209

157 900116
INDUSTRIAL FUEL OILS, INC.
1702 S. FAIRFIELD AVENUE
FORT WAYNE,IN_46804

155 900116
INDIANA AIR NATIONAL GUARD
BAER FIELD
FORT WAYNE,IN_46809

159 900116
JAMESON CORP. OF INDIANA
209 W. OHIO STREET
P.O. BOX 247
KENDALLVILLE,IN_46755-2015

160 900116
JIM KELLY BUICK, INC.
1819 S. CALHOUN
FORT WAYNE,IN_46804

158 900116
INTERNATIONAL HARVESTER COMPANY
2701 COLISEUM BOULEVARD
P.O. BOX 596
FORT WAYNE,IN_46801

162 900116
JOSAM MANUFACTURING COMPANY
1508 EAST SECOND STREET
MICHIGAN,IN_46360

163 900116
JOY MANUFACTURING COMPANY
301 GRANT STREET
PITTSBURGH,PA_15219

161 900116
JOHNSON PRODUCTS
2100 STERLING AVENUE
ELKHART,IN_46516

165 900116
KREAGER BROTHERS EXCAVATING
RURAL ROUTE 1
CROMWELL,IN_46732

166 900116
KOONTZ EQUIPMENT
6946 LILAC ROAD
PLYMOUTH,IN_46563

164 900116
K. MART DISTRIBUTION CENTER
P.O. BOX 359
FORT WAYNE,IN_46801

168 900116
KERR GLASS MANUFACTURING CORP.
524 EAST CENTER
DUNKIRK,IN_47336

169 900116
LARDEN CORP.
BRUCE R. MANNINNEY
11 S. MERIDIAN ST. SUITE 1313
BARNES AND THORNBURG
INDIANAPOLIS,IN_46204

167 900116
KITCHEN QUIP, INC.
WILLIAM L. SWEET, JR.
P.O. BOX 2263
BARRETT, BARRETT & MCNAGNY
FORT WAYNE,IN_46801

171 900116
(RA) GENE LOPSHIRE
401 W. FAIRFAX
FORT WAYNE,IN_46807

172 900116
LIMA CITY MFG. CO., INC.
1470 ETNA AVENUE
P.O. BOX 509
HUNTINGTON,IN_46750-3640

170 900116
RUFUS H. CRAIG, DIRECTOR OF LAW
MACMILLAN BLOEDAL, INC.
P.O. BOX 366
PINE HILL,AL_36769

174 900116
LINCOLN MANUFACTURING COMPANY INC
P.O. BOX 1229
FORT WAYNE,IN_46801

175 900116
LOBDELL-EMERY MFG. CO.
10850 17TH STREET
ARGOS,IN_46501-9703

173 900116
LIMESTONE PRODUCTS, INC.
P.O. BOX 618
PORTLAND,IN_47371

177 900116
LYDELL, INC.,
ELASTOMER PRODUCTS GROUP
P.O. BOX 29

178 900116
ZANEX, INC.
100 PROGRESS WAY W.
AVILLA,IN_46710

176 900116
LOCK JOINT TUB COMPANY, INC.
1400 RIVERSIDE DRIVE
P.O. BOX 239
South Bend IN 46625

GERBER STREET
LIGONIER,IN_46767-0491

180 900116
THOMAS M. MAYNER, ESQ.
MAGNAVOX CONSUSMER ELECTRIC CO.
P.O. BOX 14810
NORTH AMERICAN PHILIPS COMPANY
KNOXVILLE,TN_37914

181 900116
D.T. CARLTON
MAGNAVOX GOV. & INDUSTRIAL
1313 PRODUCTION ROAD
ELECTRONICS COMPANY
FORT WAYNE,IN_46808

179 900116
ZOLLNER CORPORATION
MILES C. GERBERDING
P.O. BOX 2263
BARRETT, BARRETT & MCNAGNY
FORT WAYNE,IN_46801

183 900116
MARTIN OIL
4501 127TH ALSIP
BLUE ISLAND,IL_60406

184 900116
STEPHEN T. BEMIS
ASSISTANT CORPORATE COUNSEL
21001 VAN BORN ROAD
MASOD INDUSTRIES, INC.
TAYLOR,MI_48180

182 900116
MAPLEWOOD SHELL SERVICE
6132 STELLHORN ROAD
FORT WAYNE,IN_46815

186 900116
MCCORD HEAT TRANSFER CORP.
500 W. HARRISON STREET
PLYMOUTH,IN_46563-1324

187 900116
MCDONELL ENTERPRISES, INC.
JAMES W. WOODSMALL, ESQ.
121 W. FRANKLIN STREET, STE 400
HARRICK, WEAVER, & BOYN
ELKHART,IN_46516

185 900116
MATERIALS HANDLING EQUIPMENT CORP
7433 US HIGHWAY 30 E.
FORT WAYNE,IN_46803

189 900116
MEANS SERVICE, INC.
(RA) CT CORP.
1 N. CAPITAL AVENUE
INDIANAPOLIS,IN_46240

190 900116
MEEK MACK, INC.
6529 MAPLEDOWNS DRIVE
FORT WAYNE,IN_46815

188 900116
M.A. AILES
VICE PRESIDENT-TREASURER
909 N. LAFAYETTE STREET
MCGILL MANUFACTURING CO. INC,
VALPARAISO,IN_46383

192 900116
MISHAWAKA CITY SCHOOLS
1402 S. MAIN
MISHAWAKA,IN_46544

193 900116
MONSANTO
910 GERBER STREET
LIGONIER,IN_46767

191 900116
METALLURGICAL PROCESSING, INC.
3715 E. WASHINGTON BOULEVARD
P.O. BOX 10842
FORT WAYNE,IN_46854-0842

195 900116
MYERS SEPTIC SERVICE
ROUTE 3
LIGONIER,IN_46767

196 900116
MAAS FOOD
RURAL ROUTE 5
PORTLAND,IN_47371

194 900116
MOORE BUSINESS FORMS
WEST MILL
ANGOLA,IN_46703

198 900116
NATIONAL HEAT TREATING CORP.
1621 S. MONROE
FORT WAYNE,IN_46803

199 900116
NORFOLK & WESTERN RAILWAY CO.
8111 NELSON ROAD
FORT WAYNE,IN_46803

197 900116
R.M. RIVETNA, MANAGER
ENVIRONMENTAL ENGINEERING
8101 WEST HIGGINS ROAD
NATIONAL CAN CORP.
CHICAGO,IN_60631

201 900116
NIPSCO
5265 HOHMAN AVENUE
HAMMOND,IN_46320

202 900116
NORTHERN INDIANA PUBLIC SRVS. CO
5265 HOLHMAN AVENUE
HAMMOND,IN_46320

200 900116
NORTH AMERICAN VAN LINES, INC.
5001 U.S. HIGHWAY 30 W.
FORT WAYNE,IN_46818

204 900116
ONTARIO FORGE CORPORATION

205 900116
ORTON-MCCULLOUGH CRANE

203 900116
O.P.C. MEDICAL SYSTEMS

SOUTH BEND,IN_46624

Ontario Forge Corporation
1200 WEST JACKSON STREET
P.O. BOX 2757
MUNCIE,IN_47308

207 900116
PHD CO.
4763 N. U.S. 24 E.
HUNTINGTON,IN_46750-9617

208 900116
DAINE W. SKINNER
ASSISTANT RISK MANAGER
P.O. BOX 943
PHILLIPS INDUSTRIES, INC.
DAYTON,OH_45401

206 900116
PAR-TEE COMPANY, INC.
STATE ROAD ONE
SPENCERVILLE,IN_46788

210 900116
POORMAN'S HEATING AND AIR
CONDITIONAING SERVICE, INC.
1417 MARTIN
FORTY WAYNE,IN_46802

211 900116
POWER PLANT SERVICE, INC.
2010 LAKEVIEW ROAD
FORT WAYNE,IN_46808-3922

209 900116
PLYMOUTH COMMUNITY SCHOOLS
701 EAST BERKELEY STREET
PLYMOUTH,IN_46563

213 900116
R.J. RINA, SUPERVISOR
ENVIRONMENTAL AFFAIRS
P.O. BOX 1348
PANHANDLE EASTERN PIPELINE CO.
KANSAS CITY,MO_64141

214 900116
RONALD R. RICHEY
PRECISION PLASTICS, INC.
P.O. BOX 329
COLUMBIA CITY,IN_46725

212 900116
PRAIRIE VIEW LANDFILL
P.O. BOX 128
WYATT,IN_46595

216 900116
MONICA M. POMRMAN, SR. ATTORNEY
R.R. DONNELLEY & SONS
2223 MARTIN LUTHER KING DRIVE
CHICAGO,IL_60616

217 900116
RACO, INC.
HARVEY RUSSELL, INC.
P.O. BOX 4002
MISHAWAKA,IN_46755

215 900116
PRINCO, INC.
P.O. BOX 9782
FORT WAYNE,IN_46899

219 900116
RENCO OIL
P.O. BOX 610
MISHAWAKA,IN_46544

220 900116
RENSBERGER OIL
1604 ROPEL
SOUTH BEND,IN_46628

218 900116
RECLAIMER, INC.
P.O. BOX 610
MISHAWAKA,IN_46755

222 900116
ROPPE RUBBER CORP.
101 INDUSTRIAL DRIVE
ANGOLA,IN_46703-1045

223 900116
RYDER TRUCK RENTAL
FORT WAYNE LEASING
P.O. BOX 419
FORT WAYNE,IN_46801

221 900116
ROCKWELL INTERNATIONAL
1001 W. CULVER ROAD
KNOX,IN_46534

225 900116
SEAMCO
503 E. BROAD
SOUTH WHITLEY,IN_46787

226 900116
SHANBAN & CO., INC.
2531 BREMER DRIVE
FORT WAYNE,IN_46803

224 900116
RYDER TRUCK RENTAL & LEASING
DISTRICT OFFICE
5225 NEW HAVEN AVENUE
FORT WAYNE,IN_46803

228 900116
SHELL CAR WASH
1001 W. 7TH
AUBURN,IN_46706

229 900116
SHELLER GLOBE
P.O. BOX 962
TOLEDO,OH_43697

227 900116
SHANE & HEATT MANAGEMENT
P.O. BOX 125
SWAYZEE,IN_46986

231 900116
SHOAFF PARK BAPTIST CHURCH
6651 ST. JOE ROAD
FORT WAYNE,IN_46815

232 900116
STEFFEN'S JOHN DEERE
SALES & SERVICE
P.O. BOX 294
BLUFFTON,IN_46714

230 900116
SHENKEL'S ALL STAR DAIRY, INC.
1019 PLAINHILL ROAD
HUNTINGTON,IN_46750

234 900116
SIBLEY MACHINE & FOUNDRY CORP.
206 EAST TUTT STREET
P.O. BOX 40
SOUTH BEND,IN_46624

235 900116
SIMERMAN CONSTRUCTION
5720 HUGUENARD ROAD
FORT WAYNE,IN_46818

233 900116
SMALL PARTS, INC.
P.O. BOX 23
LOGANSPORT,IN_46947

237 900116
STANADYNE, INC.
SIDNEY HARGOUS, ESQ.
1 FIRST NATIONAL PLAZA, STE. 5000
WINSTON AND STRAWN
CHICAGO,IL_60603

238 900116
STEFFEN WILLIAM & SON
IMPLEMENTATION SHOP
697 N. MAIN
BLUFFTON,IN_46714

236 900116
SOUTH BEND LATHE
400 W. SAMPLE STREET
SOUTH BEND,IN_46625

240 900116
STOUTCO, INC.
1 STOUTCO DRIVE
P.O. BOX 307
BRISTOL,IN_46507-0307

241 900116
STRAUSS, INC.
22 E. MAIN STREET
NORTH MANCHESTER,IN_46960

239 900116
SUPERIOR WASTE SYSTEMS
C/O ROGER ZENNTER
3003 BOTTERFIELD ROAD
WASTE MANAGEMENT, INC.
OAK BROOK,IL_60521

243 900116
SUPERIOR CO., INC.
1610 CALHOUN STREET
FORT WAYNE,IN_46808-2408

244 900116
SUPERIOR LINKAGE
2110 SUMMIT
NEW HAVEN,IN_46769

242 900116
SUN OIL COMPANY
P.O. BOX 30
HUNTINGTON,IN_46750

246 900116
SUPREME CORP.
16500 COUNTY ROAD 28
P.O. BOX 463
GOSHEN,IN_46526-9358

247 900116
RUSSELL E. SUSAG, PHD., P.E.
DIR, ENVIRONMENTAL REGULATORY
P.O. BOX 33331
AFFAIRS
ST. PAUL,MN_55133

245 900116
SUPERIOR WASTE SYSTEMS
54107 BUTTERNUT ROAD
SOUTH BEND,IN_46628

249 900116
TTP, INC.
ROUTE 8
P.O. BOX 317
WARSAW,IN_46880

250 900116
VIC TRIPPEL PLUMBING, HEATING,
AIR CONDITIONING, INC.
545 W. 3 MISHAWAKA
MISHAWAKA,IN_46545

248 900116
SYNDICATE SALES, INC.
801 W. MORGAN
KOKOMO,IN_46901-2055

252 900116
U.S. AVIEX CO.
P.O. BOX 340
1600 TERMINAL ROAD
NILES,MI_49120

253 900116
UNIROYAL PLASTICS CO., INC.
312 N. HILL STREET
P.O. BOX 2000
MISHAWAKA,IN_46544-1320

251 900116
USA 1 - ENTERPRISES, INC.
2501 LWW
MISHAWAKA,IN_46544

255 900116
UNITED STATES POST OFFICE
424 SOUTH MICHIGAN
SOUTH BEND,IN_46601

256 900116
UNIVERSAL TOOL & STAMPING CO.
GRANT VAN HORNE
P.O. BOX 523
AUBURN,IN_46706

254 900116
UNITED STATES GYPSUM CO.
3501 CANAL STREET
EAST CHICAGO,IN_46312

258 900116
VITREOUS STEEL
900 E. WABASH AVENUE
WAPPANEE,IN_46550

259 900116
VULCRAFT
COUNTY ROAD 60
ST. JOE,IN_46785

257 900116
VALLEY MACHINE PRODUCTS
1840 BORNEMAN AVENUE
ELKHART,IN_46517

261 900116
WABASH FIBRE BOX CO.
WESTON PAPER AND MFG. CO.
FERGUSON ROAD, BAER FIELD
FORT WAYNE,IN_46809

262 900116
WABASH, INC.
411 E. SOUTH
HUNTINGTON,IN_

250 900116
WABASH ALLOYS, INC.
DIVISION OF OSBORN CORP.
P.O. BOX 466
OLD U.S. 24 W.
WABASH,IN_46992-0466

264 900116
JAN WATERS & ROGERS
7603 WELSO ROAD
FORT WAYNE,IN_46803

265 900116
JOE WATKINS
RURAL ROUTE 4
FORT WAYNE,IN_46819

263 900116
WALERKO TOOL
1935 W. LUSHER
ELKHART,IN_46517

267 900116
WAYNE METAL PROTECTION CO.
1511 WABASH AVENUE
FORT WAYNE,IN_46803-2166

268 900116
WAYNE RECLAMATION & RECYCLING INC
LARRY BROCKMAN
P.O. BOX 467
DANIEL DRIVE
COLUMBIA CITY,IN_46725

266 900116
WAYNE HOME EQUIPMENT
DIVISION OF SCOTT & FETZER
801 GLASGOW AVENUE
FORT WAYNE,IN_46803-1344

270 900116
WOODALL
10261 S. INDIAN LAKE BOULEVARD
INDIANAPOLIS,IN_46236

271 900116
WORLD COLOR PRESS
CHEMICAL PLATE CORP.
P.O. BOX 1280
EFFINGHAM,IL_62401

269 900116
WHIPLEY PRODUCTS
1403 STANLEY DRIVE
PLYMOUTH,IN_46563

272 900116
XOLOX CORPORATION
6932 GETTYSBURG PIKE
FORT WAYNE,IN_46804

ATTACHMENT III

PROPOSED PLAN

WAYNE RECLAMATION AND RECYCLING SITE
COLUMBIA CITY, INDIANA

WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN
COLUMBIA CITY, INDIANA

INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summaries information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

Peabody Library
203 N. Main Street
Columbia City, Indiana 46725

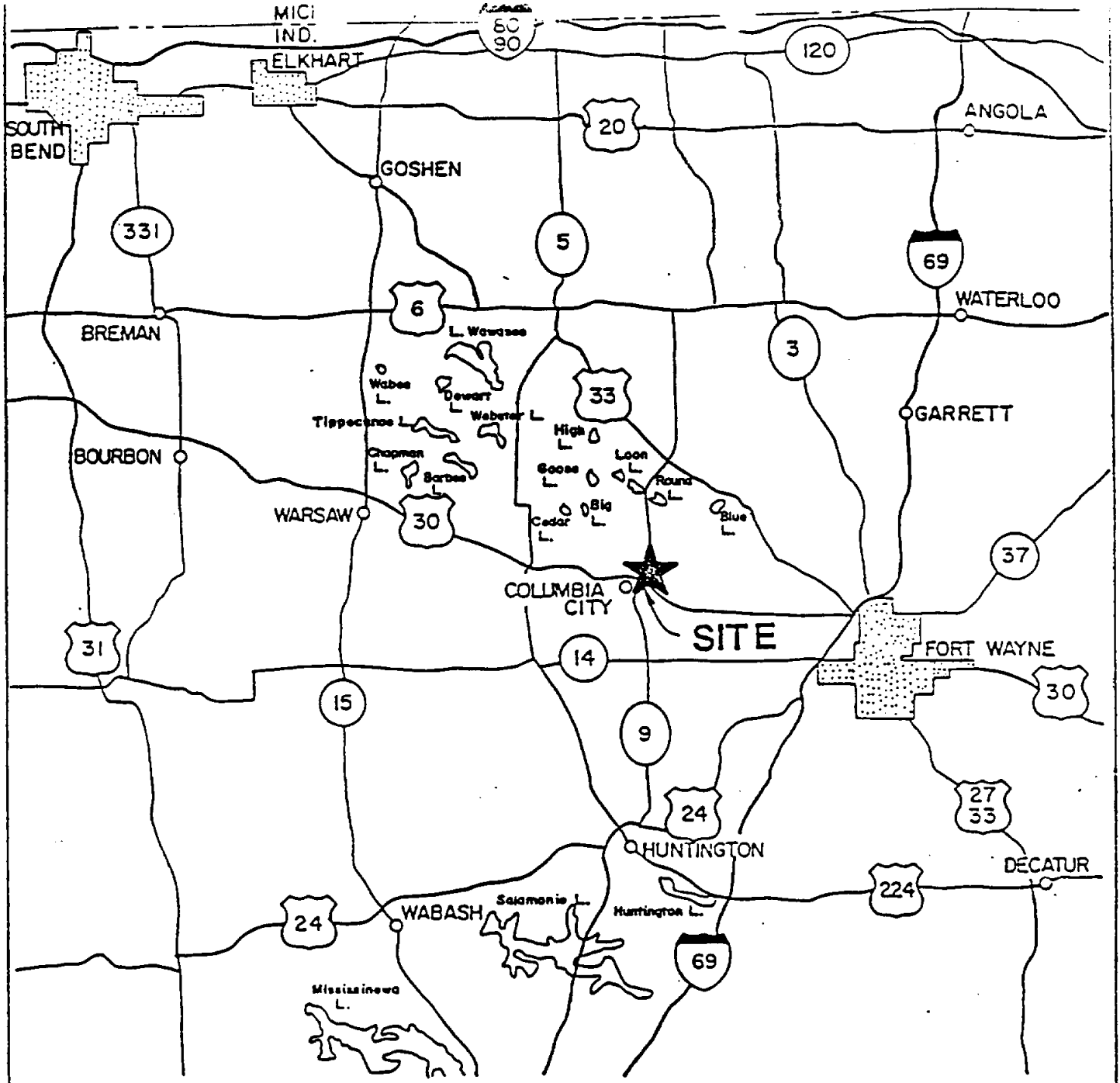
Columbia City Hall
211 S. Chauncey Street
Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

SITE BACKGROUND

Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



north

SCALE: 1"=10 MILES

FIGURE 1

WAYNE REGIONAL LOCATION MAP

WAYNE RECLAMATION & RECYCLING FEASABILITY STUDY
COLUMBIA CITY INDIANA

WARZYN ENGINEERING INC

DWN D.L.L.	APP'D	DATE	60128.20

IELEDYNE POST N-7178

In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

- Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).

LEGEND

- GROUNDWATER
- SOILS - VOC's
- SOILS - PAH's
- SOILS - METALS
- MW2s — MONITORING WELL LOCATION & NUMBER

NOTES:

1. REFER TO REMEDIAL INVESTIGATION REPORT FOR SPECIFIC LEVELS AND TYPES OF CONTAMINANTS LOCATED.

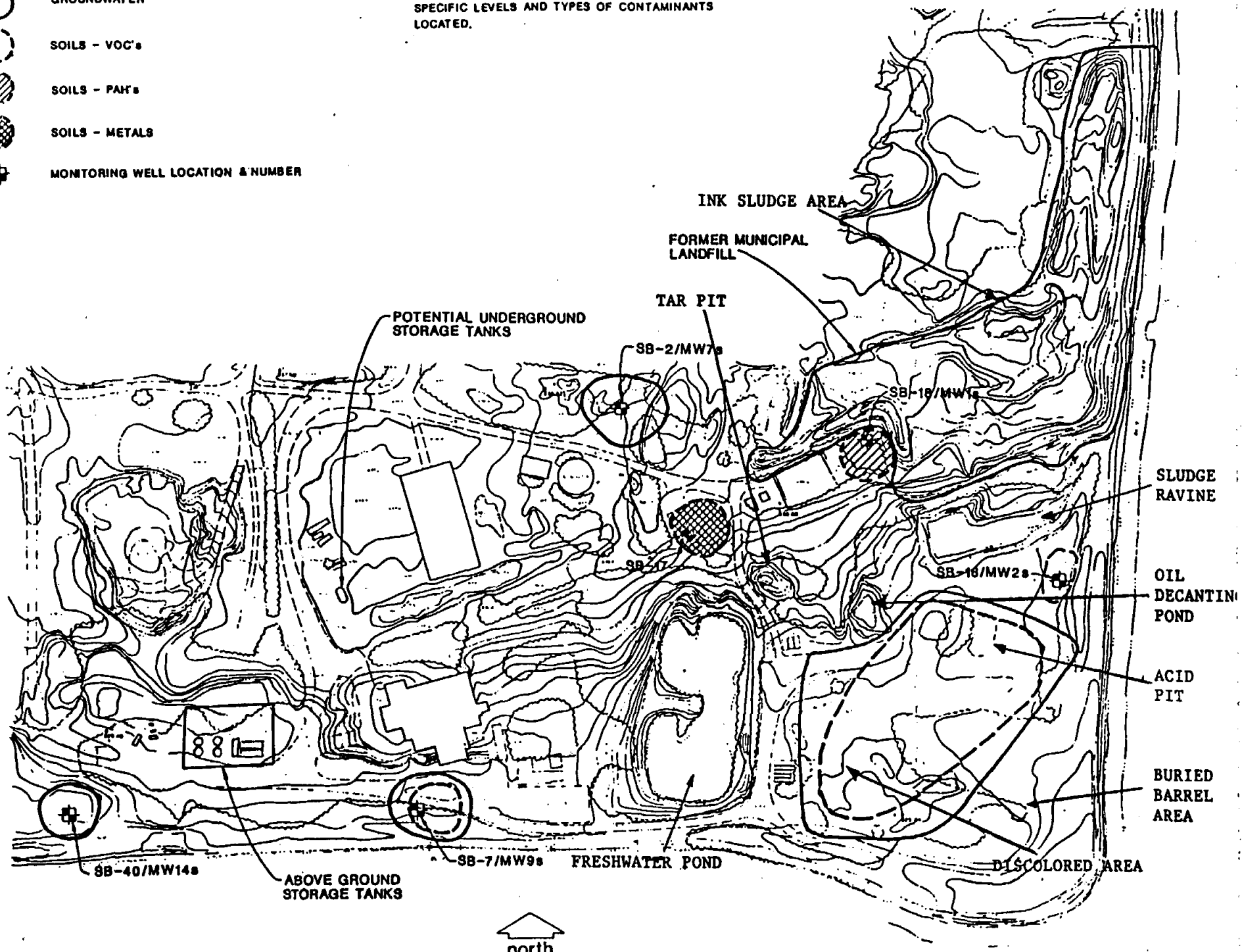


FIGURE 2

- The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.

- The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.

- Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.

- Concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."

- Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the

"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of 2×10^{-4}. This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs) and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of 3×10^{-2}. This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

Groundwater

- Minimize potential future risk to public health from consumption of contaminated groundwater.
- Control migration of contaminated groundwater to the Blue River water and sediment.
- Reduce migration of subsurface soil contaminants to the groundwater

Contaminated Soil

- Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

Municipal Landfill

- Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

Surface and Subsurface Tanks and Contents

- Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

Alternative 1: NO ACTION

Capital Cost:	$0
Annual O&M Cost:	$0
Present Worth:	$0
Time to Implement:	None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost:	$3,329,630
Annual O&M Cost:	$ 228,500
Present Worth:	$5,483,700
Time to Implement:	30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost:	$3,248,230
Annual O&M Cost:	$ 236,700
Present Worth:	$5,110,848
Time to Implement:	15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost:	$3,306,875
Annual O&M Cost:	$ 291,000
Present Worth:	$5,582,499
Time to Implement:	15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 5: **GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost:	$7,988,170
Annual O&M Cost:	$ 279,000
Present Worth:	$9,927,114
Time to Implement:	15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 6: **GROUNDWATER EXTRACTION AND AIR STRIPPING/ EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost:	$ 9,805,845
Annual O&M Cost:	$ 228,500
Present Worth:	$11,322,222
Time to Implement:	10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled on-site. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS

Capital Cost:	$3,571,980
Annual O&M Cost:	$ 298,500
Present Worth:	$6,385,960
Time to Implement:	30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would is based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

EVALUATION OF ALTERNATIVES

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

Analysis

Overall Protection. All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

Compliance with ARARs. All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARs is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

Long-term effectiveness and permanence. The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.

TABLE 1

GLOSSARY OF THE NINE CRITERIA

Community Acceptance	will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.
Compliance with ARARs	addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.
Cost	includes capital and operation and maintenance costs.
Implementability	is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.
Long-term Effectiveness and Permanence	refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.
Overall Protection of Human Health and the Environment	addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.
Reduction of Toxicity, Mobility, and Volume	is the anticipated performance of the treatment technologies a remedy may employ.
Short-term Effectiveness	involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.
State Acceptance	indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

Reduction of toxicity, mobility, or volume of the contaminants through treatment. Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

Short-term effectiveness. The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

Implementability. The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

Cost. The present-worth cost of the preferred alternative is $5,582,500. The lowest-cost alternative is Alternative 3 at $5,110,800. The highest-cost alternative is Alternative 6 at $11,322,200. Alternatives 2, 5 and 7 have present-worth costs of $5,483,700, $9,927,100, and $6,386,000, respectively.

State acceptance. The State of Indiana Department of Environmental Management supports the preferred alternative.

Community acceptance. Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. Based on the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall
112 South Chauncey
Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde
Remedial Project Manager
U.S. EPA - 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604
(312) 886-9296

Toll free (800) 621-8431
between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall
112 South Chauncey
Columbia City, IN

Peabody Library
203 North Main
Columbia City, IN.

THIRTEENTH ANNUAL CONTROLLERS CONFERENCE

HOLIDAY INN EAST - HARRISBURG, PA
SEPTEMBER 27 & 28, 1990

EPA COSTS LIABILITIES & REPORTING - BY C. SKORIJA, HARSCO

I. HISTORICAL PERSPECTIVE

A. ECONOMY OF WASTE

1. SLASH & BURN AGRICULTURE
2. CLEAR CUTTING OF TIMBER
3. BURNING OF FORESTS AND PRAIRIES
4. CHEAP LABOR
   - SLAVES
   - IMMIGRANTS
5. UNBRIDLED EXPLOITATION OF RAW MATERIALS

B. INDUSTRIALIZATION

1. CROWDED CITIES
2. NEGLECT OF SANITATION AND FIRE PREVENTION REQUIREMENTS
3. INTERFERENCE WITH THE NAVIGATION OF WATERCRAFT

RIVERS AND HARBORS APPROPRIATIONS ACT OF 1899

4. RAPID EXPANSION DURING AND FOLLOWING BOTH WORLD WARS
5. EXPANSION OF SUBURBAN AREAS

C. RESULTS

1. EROSION - DUST BOWL
2. FOULED WATERS - CHOLERA, THYPHOID, ETC.
3. FOULED AIR - DONORA, PA IN 1948
4. FOULED ENVIRONMENT - LOVE CANAL AND TIMES BEACH, MO
5. FOULED DRUGS - THALIDOMIDE AND DES
6. EXPLOITATION OF WORKERS - CIVIL RIGHTS ACT AND LABOR UNIONS

D. LEGISLATIVE RESPONSE

1. MEASURED RESPONSES TO SPECIFIC GAPS
2. FIRST GENERATION STATUTES IMPOSED MAJOR NEW REGULATORY PROGRAMS AND MINOR CIVIL AND CRIMINAL PENALTIES (1 YR. MAX. UNDER CWA)

3. PUBLIC FEARFULNESS IS PROPORTIONAL TO THE AMOUNT OF MEDIA COVERAGE NOT TO ITS CHARACTER - MADD

II. REGULATORY PERSPECTIVE

A. CAA OF 1990

1. REGULATES 7 POLLUTANTS SO_2, CO, PART, HYDC. EMM., PB & O_3

2. THIS STANDARD IS IN THE FINAL STAGES OF REVISION

3. PERMITS

- MUST APPLY FOR NEW PERMITS
- MAY HAVE TO MAKE APPLICATION FOR FEDERAL AND NEIGHBORING STATE PERMITS
- COMMON POLLUTANTS
  - VOC > 25T/YR. (CONVERSION TO HI-SOLIDS OR WATER BASED PAINTS ARE A MUST)
  - DUST (PM-10)
  - CFCS

- LEAD, COPPER, CADMIUM AND OTHER METALS

4. REPORTS

ANNUAL EMISSION LEVELS (SUBJ. TO TAX)

5. ACM - > 260' LINEAR OR > 160 SQ'.

B. CWA OF 1987

1. COVERS ANY WASTE INCL. HEAT

2. PERMITS

- NPDES IF DISCHARGE TO AN INLAND WATER WAY
- POTW - PRETREATMENT (CHECK WITH LOCAL POTW AND REPORT CHANGES)
- UNDERSTAND PERMIT CONDITIONS AND FOLLOW THEM RELIGIOUSLY
- REPORT EXCURSIONS
- * - DREDGE & FILL OF WETLANDS

3. SPCC PLAN

UG > 42,000 GALS.
AG > 1,320 G AND > 660/TK.

4. REPORTS

- CHEMICAL ANALYSES PER PERMIT
  COD, BOD, PH, OIL AND GREASE, ETC.
- REPORT EMISSIONS (TAXED?)

5. IMPORTANT CONSIDERATIONS

- CHECK STORM SEWERS AND SEAL THEM IN AREAS WHERE SPILLS OF INDUSTRIAL CHEMICALS ARE POSSIBLE

- HAVE SPILL CLEAN-UP MATERIALS AVAILABLE ON SITE

- STORE ALL LIQUID CHEMICALS ON CONCRETE PAD WITH BERM

C. SDWA OF 1974

1. CONTACT STATE AGENCY FOR APPROVAL BEFORE DRILLING
2. PERMITS - UNDERSTAND THEIR CONDITIONS AND FOLLOW
3. REPORTS
   - CHEMICAL ANALYSES

D. TOSCA (PCBS)

1. PERMITS - NONE REQUIRED BUT FEDERAL TOSCA STANDARD REQUIRE THAT ALL INSTALLATION CONTAINING PCBS (> 500 PPM) BE REPORTED TO LOCAL F.D.

2. QUARTERLY INSPECTIONS

   - CHECK FOR LEAKS
   - SECONDARY CONTAINMENT
   - KEEP AREAS LOCKED-UP

3. RECORDS - KEEP RECORDS OF DESTRUCTION DISPOSAL FOR 3 YEARS

E. RCRA OF 1976 - HSW AMENDMENT OF 1984

1. SOLID WASTE

   a. PERMITS - NOT REQUIRED ON FEDERAL LEVEL BUT OFTEN ARE REQUIRED ON THE LOCAL LEVEL

   b. IMPORTANT CONSIDERATIONS

      - DO TCLP ANALYSIS IF YOU SUSPECT OILS OR SOLVENTS ARE PRESENT

      - CONSIDER RECYCLING AND SUBSTITUTION

        - RETURNABLE DRUMS
        - PAPER, BOTTLE AND CAN RECLAMATION
        - KEEP RECORDS OF METAL DISPOSAL FIRM ACTIVITY (WHO ELSE IS ON YOUR ROUTE?)

      - SEGREGATE SOLID FROM RESIDUAL OR HAZARDOUS WASTE (MIXTURE RULE)

2. RESIDUAL WASTE - ONLY IN PA BUT MAY SOON APPLY ELSEWHERE

3. HAZARDOUS WASTES (H.W.)

a. PERMITS - NO HARSCO FACILITY IS A TSDF
- ALL SITES SHOULD OBTAIN A H.W. GENERATOR ID #

b. TYPE OF GENERATORS

CLASS I	> 100KG/MO	OR 220#
CLASS II	< 100KG/MO	< 1,000KG/MO
CLASS III	> 1,000KG/MO	

c. REQUIREMENTS

- ANALYZE ALL MATERIAL TO DETERMINE WHICH ARE H.W.
- STORE WITHIN CONCRETED AREA WITH BERM NEAR AN ALARM AND PORTABLE FIRE EXTINGUISHER
- DRUMS MUST MEET DOT REQUIREMENTS
- LABEL AND MARK DATE OF INITIAL REPORTING

- USE PRETREATMENT REQUIRED BY 3RD 3RD LAND BAN RESTR.
- USE PERMITTED HAULER AND DISPOSAL SITE
- INSPECT FOR LEAKS
- TRAIN H.W. HANDLERS

d. IMPORTANT CONSIDERATIONS (SAME AS CWA PLUS)

- SEGREGATE ALL WASTES
- SUBSTITUTE LESS HAZARDOUS MATERIALS WHENEVER POSSIBLE

e. REPORTING

- H.W. MANIFEST MUST ACCOMPANY EACH SHIPMENT
- MUST REPORT TO EPA IF DISPOSAL SITE DOESN'T RETURN ORIGINAL MANIFEST WITH ALL SIGNATURES
- BIENNIAL REPORT TO STATE AGENCY (USUALLY SITES ARE TAXED ON SHIPMENTS BY WEIGHT OR VOLUME)

f. FINANCIAL

- SUDDEN & NONSUDDEN INS FOR TSDF OR SITES DOING CLOSURE (CORP. GUARANTEE)
- CLOSURE GUARANTEE IS DONE VIA FINANCIAL TEST

g. LUST VS. UST

(1) > 10% OF VOLUME UNDERGROUND INCLUDING PIPING EXCEPT > 110 GALS. OF REG. SUBST.

- HEATING OIL USED ON PREMISES
- SEPTIC TANKS
- STORM WATER
- PROCESS WATER
- REG. BY OTHER STANDARDS

(2) NEW UST PIPING (AFTER 12-23-88) MUST PROT. AGAINST: CORROSION, SPILLS & OVERFILL & MUST BE PROPERLY INST'D. & CERTIFIED

(3) EXISTING TANKS

1990 LEAK TESTING PRE '69 LIST
1991 74
1992 79
1993 88

(4) LEAK REPORTING

(a) TEST FOR TIGHTNESS
(b) IF LEAKING - IMMEDIATE RESP.
(c) NOTIFY US & STATE EPA
(d) IF OVER CERT. AMOUNT ALSO REPORT TO NRC
(e) RECOVER PRODUCT

(5) CLOSURE

IF NOT USED FOR > 3 MOS, MUST CLOSE:

(a) REPORT TO STATE
(b) REMOVE
(c) CHECK FOR CONT'N

F. CERCLA

(1) FUNDED BY A TAX ON CERTAIN STOCK CHEMICALS
(2) MUST IMMEDIATELY REPORT ALL RQ RELEASES TO THE NRC 800 # (717 ITEMS)
(3) STRICT LIA OF OWNER OR OPERATOR
(4) HRS RANKING - STATE VS. FEDERAL
(5) PETROLEUM EXCL. DOESN'T EXTEND TO USED OIL.
(6) JOINT & SEVERAL LIABILITY
(7) FORBIDS INDEMNIFICATION
(8) ACT OF GOD, WAR OR 3RD PARTY

G. SARA

(1) INNOCENT LANDOWNER - GVT. DIDN'T KNOW & HAD NO REASON TO KNOW OR INHERITANCE TO ESTABLISH MUST STUDY PAST USES & SURVEY FOR OBVIOUS PROBLEMS. TAKES INTO ACCOUNT SPECIAL KNOWLEDGE & SKILL OF BUYER & PURCHASE PRICE. "GOOD COMMERCIAL OR CUSTOMARY PRACTICES."

(2) EPCRA TITLE III

(a) SET UP AFTER BHAPAL TO PREPARE COMMUNITIES TO DEAL W/ CHEM EMERGENCIES

(b) EXTREMELY HAZ. CHEMS. (400 APPROX.) - ADVISE TPQ 10/1 EACH YEAR

- ALL SPILLS
- FORM R "MASS BALANCE" 7/1 EACH YEAR FOR PROCEEDING YR. > 10,000 #S OR LISTED HAZ. MATERIALS (AS PER OSHA) > 10,000 # STORED TIER I & TIER II 3/1 EACH YEAR

III a. EPA CITATIONS AND ENFORCEMENT

A. ENVIRONMENTAL AUDITS

(1) ASSESSES MANAGEMENT PRACTICE

(2) MAY IDENTIFY VIOLATIONS OR SHOW THE TRUE TENOR OF MANAGEMENT ATTITUDES

B. INTERNAL INVESTIGATIONS

(1) INDICATIVE OF GOOD CITIZENSHIP
(2) SUMMARIZE. DON'T KEEP DETAILED OR EXTRANEOUS NOTES.

C. KEEP CORPORATE LEGAL ADVISED

D. SEPARATE COUNSEL FOR THE DIVISION AND INDIVIDUALS

e. ATTORNEY-CLIENT PRIVILEGE

f. HONEST AND FORTHRIGHT COOPERATION

P 564 596 314

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

CHARLES R. CAMPBELL
PLANT ENGINEER, BRODERICK CO.
500 LINCOLN STREET
DIVISION OF HARSCO CORPORATION
MUNCIE, IN 47302

Postage	$1.45
Certified Fee	85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$3.20
Postmark or Date	

CHICAGO LOOP STA. AUG 14 1990 USPO

PS Form 3800, June 1985

● **SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.**
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. *(Extra charge)*
2. ☐ Restricted Delivery *(Extra charge)*

3. Article Addressed to: CHARLES [illegible]. CAMPBELL PLANT ENGINEER, BRODERICK CO. [illegible] LINCOLN STREET DIVISION OF HARSCO CORPORATION MUNCIE, IN 473[illegible]	4. Article Number P 564 596 314 Type of Service: ☐ Registered ☐ Insured ☒ Certified ☐ COD ☐ Express Mail ☐ Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED.
5. Signature — Address X [illegible]	8. Addressee's Address *(ONLY if requested and fee paid)*
6. Signature — Agent X	
7. Date of Delivery 6-13-90	

PS Form 3811, Mar. 1988 ★ U.S.G.P.O. 1988-212-865 DOMESTIC RETURN RECEIPT